

[PROPOSED] ORDER

Before the Court is Administrative Motion to Seal Portions of Google LLC’s Opposition to Plaintiffs’ Supplemental Sanctions Brief Pursuant to Dkt. 624 (“Opposition”). Having considered the Opposition and good cause having been found, the Court **ORDERS** as follows:

Document	Text To Be Sealed	Basis for Sealing Portion of Document
Google LLC's Opposition to Plaintiffs' Supplemental Sanctions Brief Pursuant to Dkt. 624	GRANTED as to the portions at: Pages 1:13, 2:6, 2:18, 2:22-23, 2:26, 2:28, 3:1-6, 3:8-9, 4:10, 4:14, 5:12, 8:7	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal projects, data signals, and logs, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
Second Supplemental Declaration of Martin Sramek in Response to May 20, 2022 Order	GRANTED as to the portions at:	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's

	Pages 1:10, 1:16-18, 2:18, 2:20-24, 2:26-3:3, 3:5-8	<p>internal systems and operations, including various types of Google's internal projects, data signals, and logs, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.</p>
Exhibit 1 to Trebicka Declaration	GRANTED as to the portions at: PDF Pages 2-3	<p>The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal projects, data signals and logs, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the</p>

		<p>Protective Order entered in this action. <i>See</i> Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.</p>
Exhibit 2 to Trebicka Declaration	<p>GRANTED as to the portions at:</p> <p>Pages 140:11, 140:14-15, 140:18</p>	<p>The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal projects and logs, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.</p>
Exhibit 3 to Trebicka Declaration	<p>GRANTED as to the portions at:</p>	<p>The information requested to be sealed contains Google's highly</p>

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	Seal Entirely	<p>confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal projects, data signals, and logs, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.</p>
20 21 22 23 24 25 26 27 28	Exhibit 4 to Trebicka Declaration	<p>GRANTED as to the portions at:</p> <p>Seal Entirely</p> <p>The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal projects and their proprietary functionalities, as well as internal metrics, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's</p>

		<p>internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.</p>
	<p>Exhibit 5 to Trebicka Declaration</p>	<p>GRANTED as to the portions at:</p> <p>Pages 4:12, 4:18, 4:21, 5:14-15, 198:7, 198:18, 199:17, 201:4-5, 372:11, 372: 15, 390:1-2, 390:15, 390:20</p> <p>The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal projects, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise</p>

1			Google's internal practices relating to competing products.
2	Exhibit 7 to Trebicka Declaration	GRANTED as to the portions at: Pages 94:15-24, 96:4, 97:24, 101:11, 101:15, 101:18	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal projects and their proprietary functionalities, as well as internal metrics, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
22	Exhibit 10 to Trebicka Declaration	GRANTED as to the portions at: Pages 409:1, 410:13, 410:17, 411:22, 412:5-6, 412:10, 412:12, 413:7, 415:19-21, 417:11, 419:23, 418:1, 418:4, 418:16, 419:23, 420:2, 420:7	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal projects and internal metrics, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's

1		competitors. Such confidential and
2		proprietary information reveals
3		Google's internal strategies, system
4		designs, and business practices for
5		operating and maintaining many of
6		its important services, and falls
7		within the protected scope of the
8		Protective Order entered in this
9		action. <i>See</i> Dkt. 81 at 2-3. Public
10		disclosure of such confidential and
11		proprietary information could affect
12		Google's competitive standing as
		competitors may alter their systems
		and practices relating to competing
		products. It may also place Google
		at an increased risk of cybersecurity
		threats, as third parties may seek to
		use the information to compromise
		Google's internal practices relating
		to competing products.

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14 **SO ORDERED.**

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16 DATED: _____

17 HON. SUSAN VAN KEULEN
United States Magistrate Judge

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